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Sent: Thursday, March 23, 2023 3:07 PM

To: orphanedwells, DOI <orphanedwells@ios.doi.gov>

Cc: Wilson, Greg C (OGC) <greg.wilson@alaska.gov>; Huber, Brett W (OGC) <brett.huber@alaska.gov>; Chmielowski, Jessie L C (OGC) <jessie.chmielowski@alaska.gov>

Subject: Alaska comments to DOI on orphan well state formula grant draft guidance

The Alaska Oil and Gas Conservation Commission (AOGCC) is sending this email in support of the comments submitted by the Interstate Oil and Gas Compact Commission (IOGCC) on the orphan well state formula grant draft guidance. In addition, the AOGCC would like to emphasize the following:

- The AOGCC supports DOI's proposal that in Phase 1 states may apply for 25% of their total formula eligibility or \$25 million, whichever is greater. Consider giving the DOI grant managers the authority and flexibility to allow Alaska to apply for its total formula grant amount of \$29.364 million during Phase 1. Alaska has orphan wells in extremely remote locations in challenging environments, and we would like to minimize the amount of money spent on mobilization costs. Having all the funds available during Phase 1 may enable the AOGCC to optimize site visits and avoid repeat mobilizations.
- Allow the AOGCC to apply for formula grant funds via one application. The AOGCC is a small agency with 7 engineers and 2 geologists. Submitting multiple applications for formula grant funding would be an administrative burden for our staff.
- Only require in the formula grant application what is required in the IJIA. For example, methane monitoring should be recommended but not required.

Thank you for your consideration of the AOGCC's and IOGCC's comments. The AOGCC's goal is to optimize our operations and use the grant funds effectively.

Sincerely,
Jessie Chmielowski

Jessie Chmielowski
Commissioner
Alaska Oil and Gas Conservation Commission